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July 11, 2025

VIA ECF

Hon. Katherine Polk Failla, U.S. District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

MEMO ENDORSED

Re: *Risley v. Universal Navigation Inc., et al.*, Case No. 1:22-cv-02780-KPF

Dear Judge Failla:

We represent Plaintiffs in the above-referenced matter. We respectfully request that you order Oral Argument on Defendants' Motion to Dismiss the Second Amended Class Action Complaint ("Motion to Dismiss").

Plaintiffs believe oral argument on the underlying motion would be helpful for the Court to parse through the new legal theories raised by Defendants' new counsel in their Motion to Dismiss. Plaintiffs believe oral argument is also appropriate considering these legal theories were not introduced nor discussed at the April 10, 2025, Premotion Conference.

Respectfully submitted,

/s/ James R. Serritella

James R. Serritella

Enclosure

cc: All counsel of record (via ECF)

The Court is in receipt of Plaintiffs' request for oral argument concerning Defendants' Motion to Dismiss. If the Court determines that oral argument would be useful, it will promptly reach out to the parties.

Dated: July 14, 2025
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE